

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

OCT 7 2020

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES J. CRAWFORD,

Defendant.

4:20CR628 RLW/PLC

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Richard N. Groeneman, Special Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), specifically Title 21, United States Code, Section 841(a)(1).
2. Defendant is charged with possessing a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c).
3. Defendant is charged with being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).
4. This case is the result of a search warrant executed at a residence where Crawford had been living. On or about September 6, 2019 in St. Francois County members of the Mineral Area

Drug Task Force executed a search warrant for a residence located on Delassus. During the search of the residence, Crawford was located in a back bedroom of the residence. The search of Crawford's bedroom yielded: approximately 70 grams of methamphetamine, a digital scale, unused baggies, and a Sig Sauer 9 mm pistol.

5. Crawford's criminal history during the last fifteen years is serious and, if released, he poses a threat and danger to the community. In December of 2010, Crawford pled guilty to Possession of a Controlled Substance-Misdemeanor and was sentenced to 30 days confinement. In March of 2007, Crawford pled guilty to Felony Nonsupport and was sentenced to 2 years confinement. In February of 2005, Crawford pled guilty to Failure to Appear-Felony and was sentenced to 4 years confinement. In September of 2004, Crawford pled guilty to: (a) Dist./Del./Manu. a Controlled Substance and was sentenced to 9 years confinement; (b) Possession of Ephedrine-Man. Meth and was sentenced to 4 years confinement; and (c) Possession of Drug Paraphernalia-Meth and was sentenced to 4 years confinement. In September of 1996, Crawford pled guilty to Unlawful Possession of a Concealable Firearm and was sentenced to 4 years confinement. In February of 1992, Crawford pled guilty to Possession of a Controlled Substance and was sentenced to 2 years confinement and placed on probation, which was revoked in September of 1994. In August of 1992, Crawford pled guilty to Tampering 1st w/ Service or Utility and was sentenced to 2 years and placed on probation, which was revoked in September of 1994. The seriousness of Crawford's criminal history demonstrates he is a danger to the community. Furthermore, the fact that Crawford's probation is routinely revoked demonstrates his inability to adhere to the requirements of his probation and orders of the court and displays a high probability that Crawford will continue to commit crimes if released pending trial.

6. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, the defendant's history and characteristics; and the nature and seriousness of the

danger to any person or the community that would be posed by defendant's release, warrant defendant's detention pending trial.

7. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, as there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community, the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Richard N. Groeneman
RICHARD N. GROENEMAN, #57157(MO)
Special Assistant United States Attorney

111 South Tenth Street, 20th Floor
Saint Louis, Missouri 63102
Richard.Groeneman@usdoj.gov
Telephone: (314) 539-6806
Facsimile: (314) 539-3887